

# CREWBRIDGE LIMITED

## Anti-Forced Labour and Underage Employment Policy

(MLC 2006 Compliance)

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### Document Control

- **Document ID:** CB1030
- **Version:** 1.0
- **Effective Date:** 21 April 2026
- **Owner:** Managing Director
- **Review Cycle:** Annual

### 1. Purpose

This policy establishes CrewBridge Limited's commitment to preventing:

- 🚫 **Forced or compulsory labour (including modern slavery and human trafficking)**
- 🚫 **Underage employment at sea**

in accordance with:

- 🚫 Maritime Labour Convention (MLC) 2006 (Regulation 1.1 & 1.4)
- 🚫 ILO Forced Labour Conventions
- 🚫 ILO Minimum Age Convention

### 2. Scope

This policy applies to:

- 🚫 All Clients (shipowners/operators)
- 🚫 All seafarers engaged through Client systems audited by CrewBridge
- 🚫 All recruitment, placement, and employment processes under CrewBridge oversight



### 3. Policy Statement

CrewBridge Limited has **zero tolerance** for:

- ☒ Forced labour, bonded labour, or human trafficking
- ☒ Retention of identity documents
- ☒ Coercion, intimidation, or restriction of movement
- ☒ Employment of seafarers below the legal minimum age

All seafarers must:

- ☒ Be **freely employed**
- ☒ Have the **legal right to work at sea**
- ☒ Meet **minimum age requirements under MLC**

### 4. Minimum Age Requirements (MLC Regulation 1.1)

CrewBridge enforces the following:

- ☒ No person under **16 years** shall be employed at sea
- ☒ No person under **18 years** shall:
  - ☒ Work at night (except where permitted by law)
  - ☒ Perform hazardous work
  - ☒ Be employed as a ships cook

Clients must:

- ☒ Verify date of birth through official documents
- ☒ Maintain records of age verification
- ☒ Ensure compliance with flag state and CBA requirements

### 5. Prevention of Forced Labour

The following practices are strictly prohibited:

- ☒ Charging recruitment or placement fees (see CB1029 – No Fees Policy)
- ☒ Retaining passports or identity documents
- ☒ Requiring deposits or financial guarantees
- ☒ Restricting freedom of movement
- ☒ Withholding wages unlawfully



## 6. Responsibility Split

### Client Responsibilities

- ☒ Verify age and identity of all seafarers
- ☒ Ensure voluntary employment
- ☒ Maintain supporting documentation
- ☒ Prevent coercive or exploitative practices

### CrewBridge Responsibilities

- ☒ Audit Client compliance through:
  - ☒ Appendix C – Audit Check Sheet (CB1022)
  - ☒ Sample-based file reviews
- ☒ Verify age and documentation during audits
- ☒ Investigate any allegations of forced labour or underage employment
- ☒ Record and escalate non-conformities

## 7. Monitoring and Verification

### SOP

1. Verify age documentation during Client onboarding (CB1014)
2. Include age and identity checks in audits (CB1022)
3. Conduct sample file reviews of seafarer records
4. Cross-check complaints and reports (CB1023)
5. Record findings in audit logs (CB1026)
6. Initiate CAPA where required

## 8. Reporting and Complaints

- ☒ Seafarers may report concerns via:
  - ☒ Complaints Form (CB1025)
  - ☒ Direct contact channels
- ☒ All reports will be:
  - ☒ Logged in the Complaints Register (CB1023)
  - ☒ Investigated promptly and confidentially

Anonymous reporting is permitted.

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## 9. Non-Compliance

Any breach of this policy is considered a **serious non-conformity**, including:

- ☒ Immediate investigation
- ☒ Mandatory corrective action
- ☒ Potential termination of Client relationship
- ☒ Escalation to relevant authorities where required

## 10. Record Keeping

The following must be maintained:

- ☒ Age verification records
- ☒ Audit findings
- ☒ Complaint records
- ☒ Corrective actions

All records must be:

- ☒ Secure
- ☒ Accessible for audit
- ☒ Retained in accordance with policy

## 11. Review

This policy will be reviewed:

- ☒ Annually
- ☒ Upon regulatory changes
- ☒ Following any serious incident
- ☒

## Approval

**Approved by:** \_\_\_\_\_  
Managing Director  
CrewBridge Limited

**Date:** \_\_\_\_\_

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